



*Riverside County*

***Waste Management Department***

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*Riverside County*  
**Waste Management Department**



# Old Uniform













# 500



**TO REPORT A  
NON-EMERGENCY  
ENVIRONMENTAL CRIME,  
CALL THE  
DISTRICT ATTORNEY'S  
ENVIRONMENTAL CRIMES  
TASK FORCE**





**RIVERSIDE COUNTY'S  
HAZARDOUS WASTE  
PROBLEM**

**WHY DON'T OTHER  
COUNTIES HAVE THE  
SAME PROBLEM?**

**WHAT NEEDS TO BE  
DONE**









# Trailer Manufacturer













**Riverside County**  
**Waste Management Department**

**HAZARDOUS WASTE**  
**INSPECTOR**  
**INCIDENT REPORT**

**Form Information...**

Incident #: 166 Form #: 01421 Date: 01/30/01 Time: 09:21:00  
Site #: 31 LAMB CANYON  
Inspector: D. GULLO Responding Inspectors:

*NOTE: Please give complete details of the incident with amounts, names & types of hazardous waste. Complete details of ANY exposures should be included. Please indicate decontamination measures (who, where, how), location of hazardous waste, and the agency(s) called for a response.*

**Responsible Party Information...**

Name / Company: EVANS TIRE COMPANY  
Address: 2475 SOUTH SAN JACINTO ST.  
City: SAN JACINTO Zip Code:  
Phone: (951) 287-1287

**Hauler / Company Information...**

Hauler / Co. Name: OK ASSOCIATES Driver's Name: AL  
License Plate: 3Z86122 Ticket #: P40327  
Load Origin: SAN JACINTO Make / Model: ROLL OFF

**Hazardous Material Found...**

FLAMMABLE SOLID: FLAMMABLE [1 GAL Container] 1 x 1 GL = 1.00 GL  
LATEX PAINT: RECLAIMABLE [1 GAL Container] 2 x 1.5 GL = 1.50 GL  
OTHER: OTHER [4 GAL Container] 1 x 2 GL = 2.00 GL  
MOTOR OIL/OIL PRODUCTS: RECLAIMABLE [1 GAL Container] 1 x 0.2 GL = 0.20 GL  
FLAMMABLE LIQUID: FLAMMABLE [1 GAL Container] 1 x 0.5 GL = 0.50 GL  
OTHER: OTHER [2 GAL Container] 1 x 1.5 GL = 1.50 GL  
MOTOR OIL/OIL PRODUCTS: RECLAIMABLE [7 GAL Container] 3 x 13.5 GL = 13.50 GL  
LATEX PAINT: RECLAIMABLE [1 QRT Container] 1 x 0.4 QT = 0.10 QT  
OTHER: OTHER [32 OZ Container] 1 x 32 WTOZ = 2.00 WTOZ  
PROPANE TANKS: FLAMMABLE [UNIT Container] 1 x 1 UN = 1.00 UN  
PROPANE TANKS: FLAMMABLE [UNIT Container] 1 x 1 UN = 1.00 UN

OK

Cancel

Next

Prev

Print

INCIDENT



Recovery Rates



position



y Code



-mail addresses

DTL

m Detail



forms






azardous Class



azardous Type



**INCIDENTS**

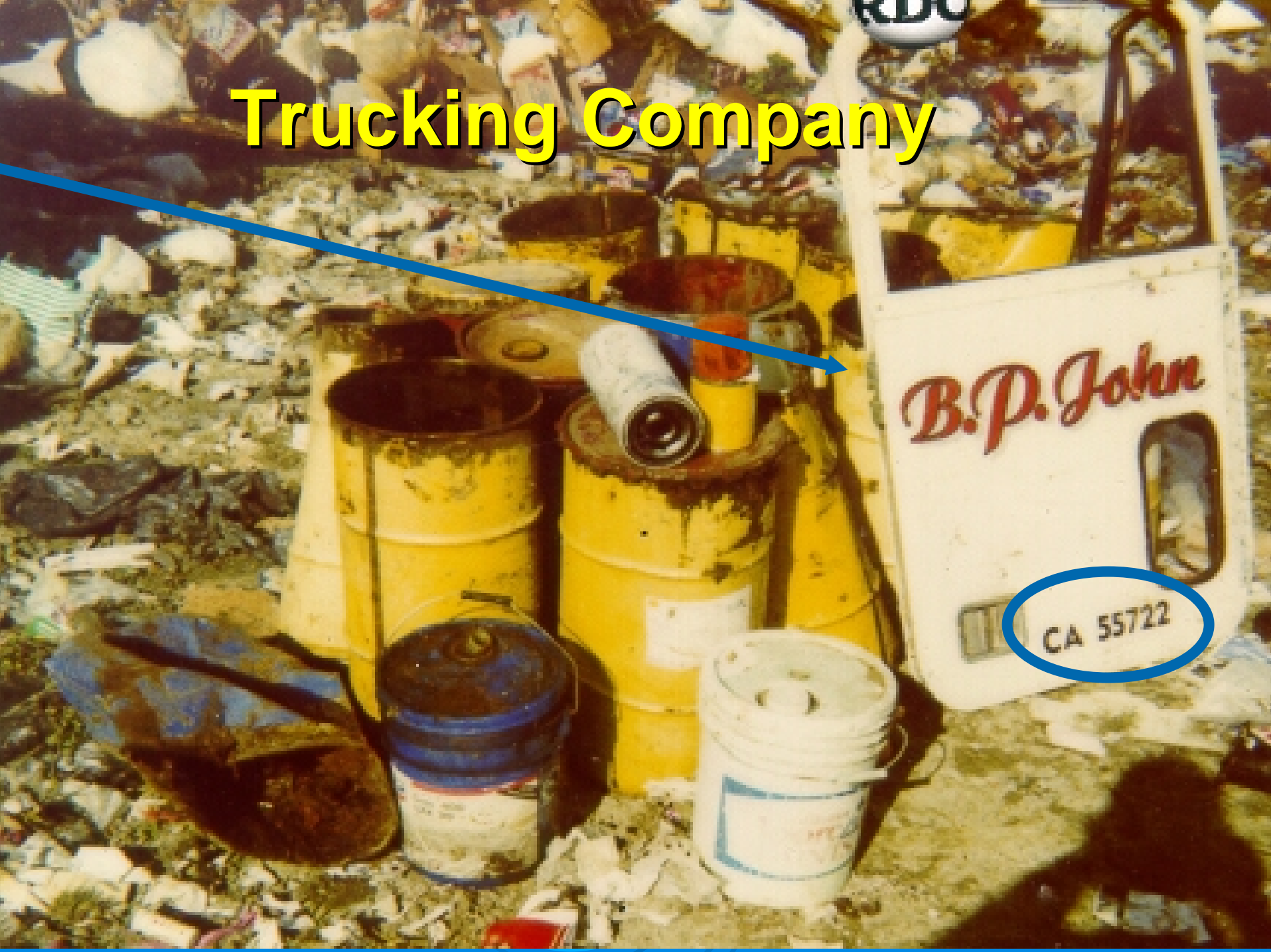
INCIDENT	DESCRIPTION	OTHER INCIDENTS	PICTURES	PICTURES #2	COST RECOVERY
					
					
					

OK  
 Cancel  
 Next  
 Prev  
 Print

Search

Remove

# Trucking Company



# Mad Home Owner





# High School Auto Shop



# Handyman



# Movie Theater





Recovery Rates



position



y Code



-mail addresses

DTL

m Detail



forms



azardous Class



azardous Type



**INCIDENTS**

INCIDENT

DESCRIPTION

OTHER INCIDENTS

PICTURES

PICTURES #2

COST RECOVERY

<



# Drug Rehab

Hi, I'm Dan  
from  
Environmental  
Crimes





**Environmental Science  
College Professor**





# Hotel



**Hotel**



# Nationwide Sport Gear Company







# Nationwide Home Improvement Company



7 10:07AM



# Nationwide Home Improvement Company



18 10:03 AM



# Worldwide Department Store



8 1:13 PM





**Worldwide Department  
Store**

8:11:13 PM

# Nationwide Department Store



**BIG** *mart* **K**

**BIG** *mark* **K**

**FIRE**

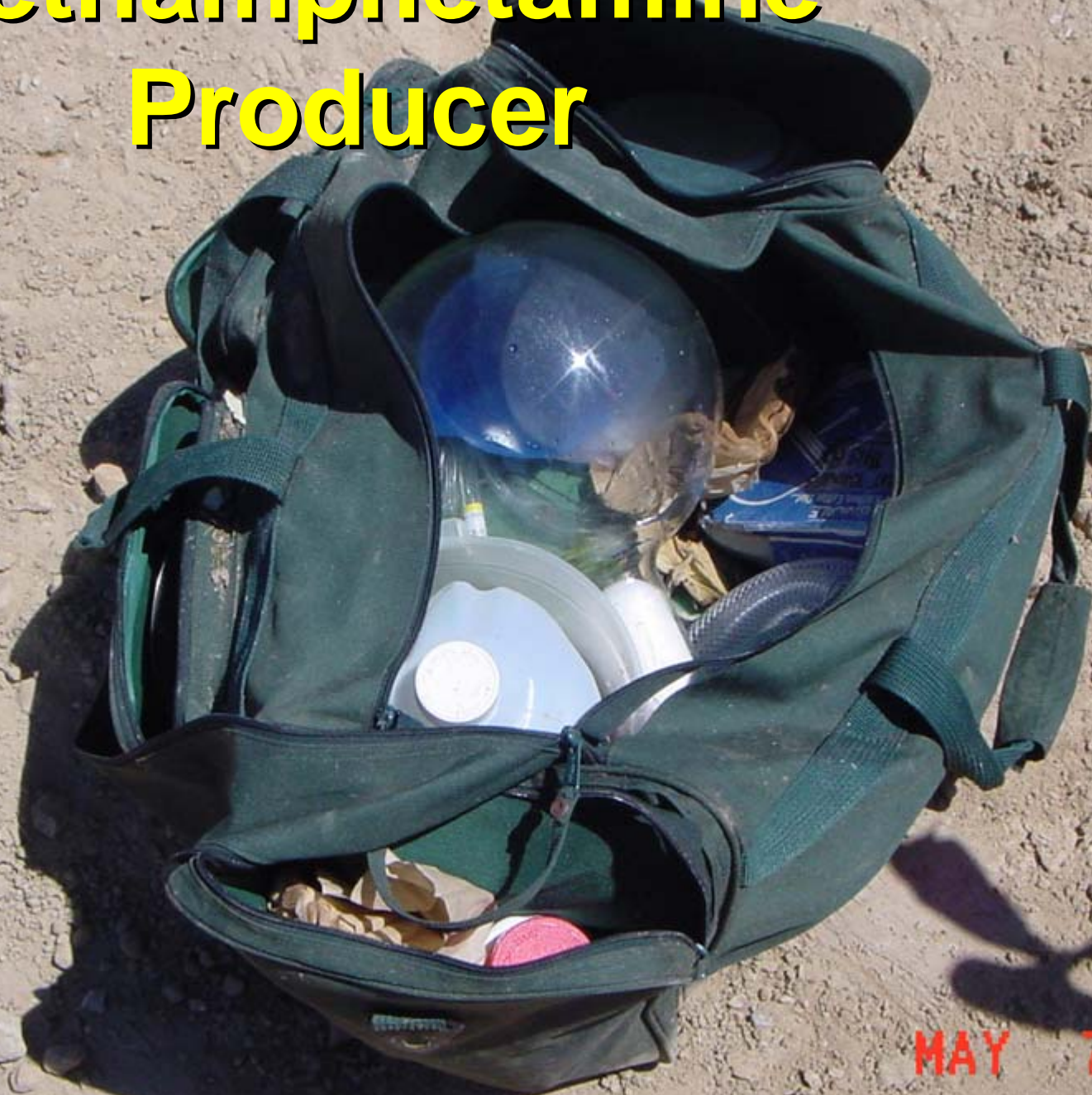








# Methamphetamine Producer



MAY 7 2001





# Farmer



Edom Hill  
Landfill 1997

# Soldier of Fortune



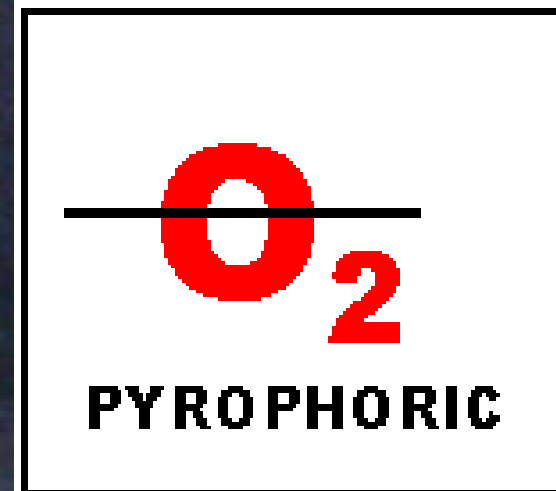
24 3:52 PM

# Another Soldier of Fortune



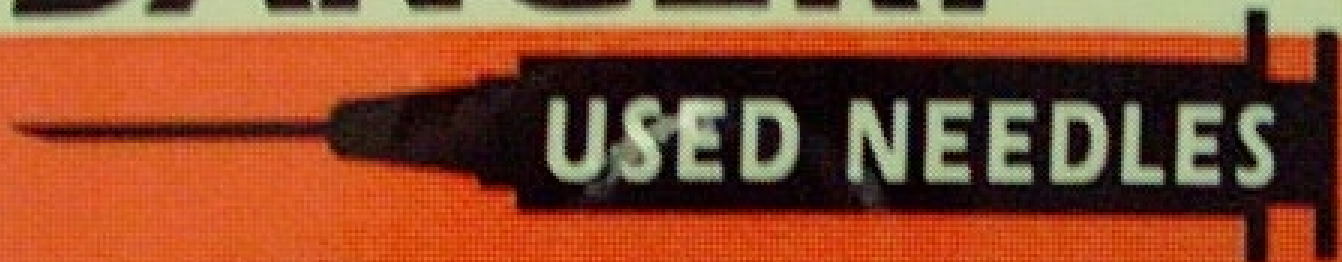
UNEXPLODED GRENADE  
IN BOMB CONTAINMENT  
TRAILER.





Movie Producer

# **DANGER!**



**CONTAMINATED  
BIOHAZARD**



**Authorized  
Personnel  
Only**

2002  
01/01/02

**SAGE**  
PRODUCTS INC.

# Community Hospital





# Community Hospital



# Regional Hospital



# Regional Medical Center



MAY 3 2002



# Regional Medical Center



MAY 14 2002

# Nationwide HMO



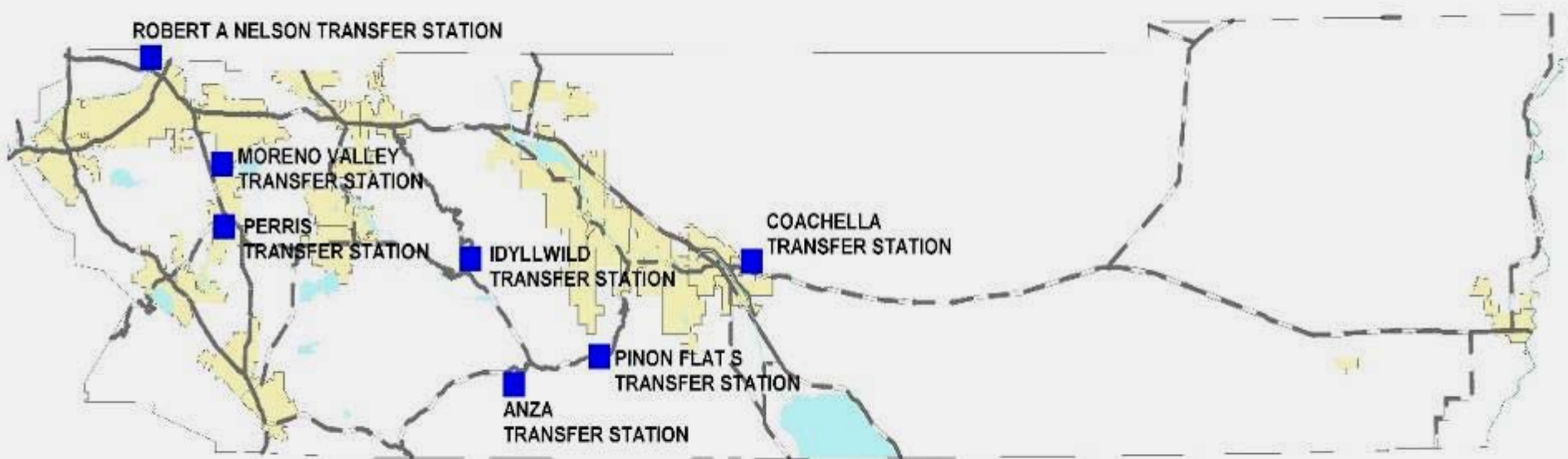
# November 2006



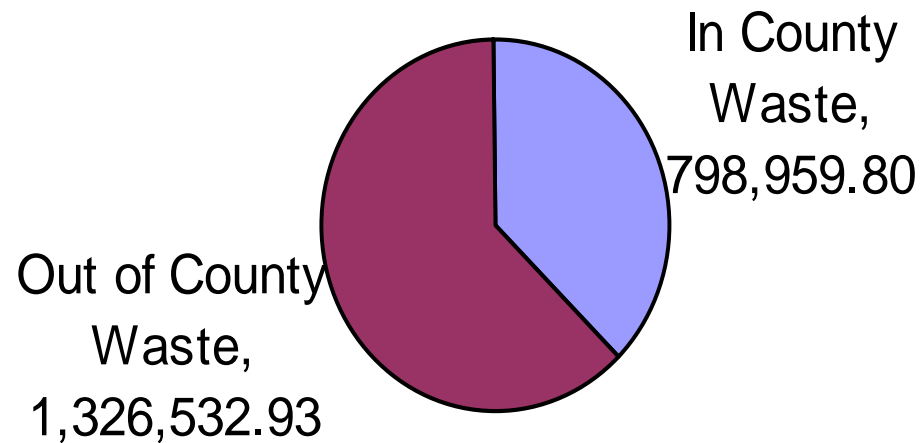




# Transfer Stations In Riverside County



# OUT OF COUNTY WASTE





# The Impossible Task



# Transfer Station Load Check Audits

- **MINIMAL TO NO LOAD CHECK ACTIVITIES**
- **UNTRAINED EMPLOYEES**
- **IMPROPERLY STORED HAZARDOUS WASTE**
- **LITTLE OR NO ENFORCEMENT FOR PROHIBITED WASTE**
- **NUMEROUS WASTE INSPECTIONS SHOWING “NONE FOUND”**

# Same Transfer Station With Our Waste Inspectors

- **3 DAYS OF INSPECTIONS**
- **4 HOURS EACH DAY**
- **23 WASTE LOADS INSPECTED**
- **13 CONTAINING HAZARDOUS WASTE**
- **4 WASTE LOADS TURNED OVER TO  
ENVIRONMENTAL CRIMES  
INVESTIGATING TASK FORCE**



# Department Store



# Auto Painting Facility



# Cosmetic Laboratory





# **Cosmetic Laboratory Returns Hazardous Waste the Next Day**



# One Week Later





# Hazardous Waste Contractor Registered Transporter









This Landfill Liner System  
= \$10 Million



# Another Transfer Station With Our Waste Inspectors

- **1 Day of Inspections**
- **6 Hours**
- **18 Waste Loads Inspected**
- **14 Containing Hazardous Waste**
- **6 Waste Loads Turned Over to  
Environmental Crimes Investigating  
Task Force**

# FLAMMABLE ADHESIVES FROM MANUFACTURER





# PALLET OF HAZARDOUS WASTE FROM HARDWARE STORE



# 1100 FULL AEROSOLS FROM DOLLAR STORE



# ORGANIC PEROXIDE FROM MOBILE HOME MANUFACTURING



APR 29 2002



# Same Stuff



A photograph showing two individuals in full-body white hazmat suits and respirators working in a hazardous waste site. They are surrounded by a large pile of debris, including plastic bags and containers. One worker is using a long-handled tool to interact with a blue barrel. A red timestamp '4 3:27 PM' is visible in the bottom right corner.

**ACID FROM  
MANUFACTURING  
COMPANY**

# ASBESTOS FROM SCHOOLS



20 8:16 AM



# DRUG LAB WASTE FROM TWEEEKERS



APR 10 2002

# Home Clean-Up Companies



19 4:38 PM

# Union Pacific





# Union Pacific



APR 24 2004

# Union Pacific



APR 23 2004

# Construction Company



22 10:38 AM



Wyle Laboratories  
pH 0 acid  
pH 14 base



# Construction Company



APR 19 2002

# Painting Contractor



03.10.2006



# CHEMICAL SUPPLY

Strong Acid

Strong Base

05.24.2005





# Flooring Contractor





# Horse Ranch



19 11:37 AM



# Trailer Park



18 11:31



# Pool Supply



SEP 17 2002



# General Contractor



12.14.2004





**SHERWIN-WILLIAMS** *PAINTS*  
International

**Worldwide Paint & Powder  
Coat Manufacturer**

AUG 1 2002





**RIVERSIDE COUNTY'S  
HAZARDOUS WASTE  
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# WHAT MUST BE DONE

- Enforcement agencies must be provided new tools to enforce effective load check programs.

OR

- Enforcement agencies must be provided new direction to use present tools more effectively.

# STATE MINIMUM STANDARDS FOR LOAD CHECKING

- VAGUE
- MISINTERPRETED
- INEFFECTIVE
- ENCOURAGES CONTINUED DUMPING  
OF HAZARDOUS WASTE INTO THE  
SOLID WASTE STREAM
- DIFFICULT TO ENFORCE

# Title 14

## Chapter 3. Minimum Standards for Solid Waste Handling and Disposal

### 17409.5. Loadchecking.

(a) The operator of an attended operation or facility shall implement a loadchecking program to prevent the acceptance of waste which is prohibited by this Article. This program must include at a minimum:



# TYPICAL COMMERCIAL ACCOUNT





2 WASTE LOADS PER WEEK  
104 LOADS PER YEAR

# PALLET OF HAZARDOUS WASTE FROM HARDWARE STORE







RANDOM WASTE INSPECTION  
MIGHT PULL TWO LOADS FOR INSPECTION



# Industry's SOPs



➤ **LOAD SELECTED FOR  
LOAD CHECK**

➤ **HAZARDOUS WASTE  
FOUND**

➤ **HAZARDOUS WASTE  
STORED IN ON SITE  
STORAGE**

➤ **HAZARDOUS WASTE  
PROPERLY DISPOSED  
OF BY SOLID WASTE  
FACILITY**



# Industry's SOPs



- NO CONTACT MADE TO RESPONSIBLE PARTY
- HAZARDOUS WASTE ACCEPTED BY SOLID WASTE FACILITY
- INCIDENT NOT REPORTED TO AUTHORITIES
- RESPONSIBLE PARTY CONTINUES TO THROW HAZARDOUS WASTE IN THE SOLID WASTE LOADS ACCEPTED BY SOLID WASTE FACILITY!








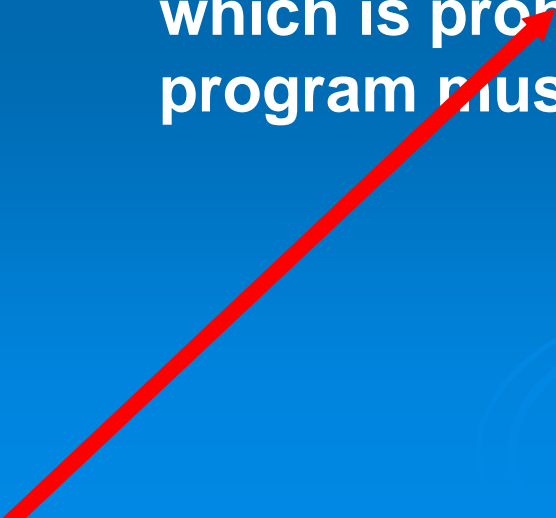
**HAZARDOUS WASTE  
ACCEPTED**

# State Minimum Standards for Load Checking

## Chapter 3. Minimum Standards for Solid Waste Handling and Disposal

### 17409.5. Loadchecking.

(a) The operator of an attended operation or facility shall implement a loadchecking program to prevent the acceptance of waste which is prohibited by this Article. This program must include at a minimum:



# What Laws Apply

- Accepting hazardous waste at a facility not authorized to accept it (Health and Safety Code §25191 (b) (6);
- In violation of Hazardous Waste Release/Spill Reporting (Health and Safety Code §25507).
- Causing the disposal of any hazardous waste, at a facility which does not have a permit from DTSC=Felony (Health and Safety Code §25189.5)



# (1) The number of inspections to be performed

- Who decides what number?
- Random inspection alone don't work!

# IT'S NOT THE QUANTITY IT'S THE QUALITY



- DON'T WASTE TIME
- WALK AROUND THE LOAD
- NO SIGN OF HAZARDOUS WASTE
- MOVE ON TO THE NEXT LOAD
- TARGET LOADS

# SAFE VANTAGE POINT



- GET IN A SAFE PLACE AND WATCH
- SEE HAZARDOUS WASTE
- ASK EQUIPMENT TO STOP
- INSPECT THAT LOAD



# MOST LOADS REQUIRING INSPECTION ARE EASY TO SPOT WHEN DUMPED



# DESERVES A CLOSER LOOK



# State Minimum Standards for Load Checking

## Chapter 3. Minimum Standards for Solid Waste Handling and Disposal

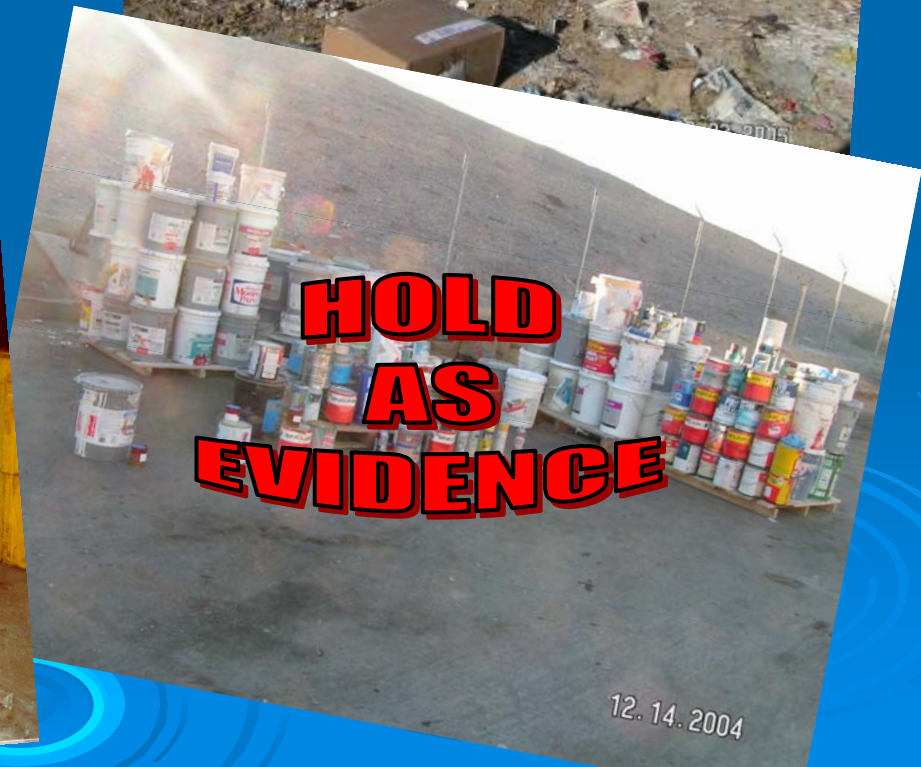
### 17409.5. Loadchecking.

(a) The operator of an attended operation or facility shall implement a loadchecking program to prevent the acceptance of waste which is prohibited by this Article. This program must include at a minimum:

(2) **a location for the storage of prohibited wastes** removed during the loadchecking process that is separately secured or isolated;



# IS IT ADEQUATE?



**HOLD  
AS  
EVIDENCE**

12.14.2004

# EQUIPPED TO STORE ALL COMMON CLASSES OF WASTE

- FLAMMABLE LIQUIDS
- FLAMMABLE SOLIDS
- CORROSIVE ACIDS
- CORROSIVE BASE
- OXIDIZER
- POISON
- LATEX PAINT
- OIL BASE PAINT
- COMPRESSED GAS
- MOTOR OIL
  - Should not mix with facility equipment maintenance oil
- BATTERIES
  - All Types
- UNKNOWNNS

# WHAT LAWS APPLY

- T22 66262.34  
STORAGE/ACCUMULATION
- T22 25244.19-21 STORAGE OF  
IGNITABLE
- T22 66265.34, 66265.171-174.  
66265.190-194 MANAGEMENT OF  
CONTAINERS



# State Minimum Standards for Load Checking

## Chapter 3. Minimum Standards for Solid Waste Handling and Disposal

(3) records of loadchecks and the **training of personnel in the recognition, proper handling, and disposition of prohibited waste**. A copy of the loadchecking program and copies of the loadchecking records for the last year shall be maintained in the operating record and be available for review by the appropriate regulatory agencies.

# TRAINING

DON'T TRAIN THE  
LOAD CHECKERS!

THEY'LL FIND  
HAZARDOUS  
WASTE!







# TRAINING

- FORMAL TRAINING IS NEEDED
  - SAFETY TAIL GATE MEETINGS ARE NOT ENOUGH
- ALL FACILITY STAFF
  - HAZ WASTE RECOGNITION
- LOAD CHECKERS
  - DETAILED HAZARDOUS WASTE TRAINING
  - HEALTH AND SAFETY TRAINING

# STORING & PACKAGING



**HAZARDOUS WASTE**  
FEDERAL AND STATE REGULATIONS REQUIRE PROPER HANDLING OF HAZARDOUS WASTE. IF YOU ARE NOT A LICENSED HAZARDOUS WASTE HANDLER, DO NOT ATTEMPT TO HANDLE HAZARDOUS WASTE. CONTACT YOUR LOCAL HAZARDOUS WASTE HANDLER FOR MORE INFORMATION.

SHIPPING LOCATION: \_\_\_\_\_ EPA HAZARDOUS WASTE ID NO.: \_\_\_\_\_ CONTAINER NO.: \_\_\_\_\_  
DATE OF SHIPMENT: \_\_\_\_\_  
ADDRESS: \_\_\_\_\_  
CITY: \_\_\_\_\_ STATE: \_\_\_\_\_  
COUNTRY: \_\_\_\_\_  
CONTAINER TYPE: \_\_\_\_\_  
CONTAINER SIZE: \_\_\_\_\_  
HAZARDOUS WASTE: \_\_\_\_\_  
HANDLE WITH CARE



# WHAT'S MISSING

## CCR Title 14

### Chapter 3. Minimum Standards for Solid Waste Handling and Disposal

#### 17409.5. Loadchecking.

(a) The operator of an attended operation or facility shall implement a loadchecking program to prevent the acceptance of waste which is prohibited by this Article. This program must include at a minimum:

- (1) **The number of inspections to be performed**
- (2) a **location for the storage** of prohibited wastes removed during the loadchecking process that is separately secured or isolated;
- (3) records of loadchecks and the **training of personnel in the recognition, proper handling, and disposition of prohibited waste**. A copy of the loadchecking program and copies of the loadchecking records for the last year shall be maintained in the operating record and be available for review by the appropriate regulatory agencies.

- REQUIREMENT FOR AN ADEQUATE NUMBER OF INSPECTION
- REQUIREMENT TO ACT WHEN HAZARDOUS WASTE IS SPOTTED IN ANY LOAD
- REQUIREMENT TO REPORT ILLEGAL DISPOSAL TO THE EA/CUPA
  - RECORD RESPONSIBLE PARTY INFORMATION



# REPORTING REQUIREMENTS

## Title 27

- Chapter 3 Criteria for All Waste Management Units, Facilities, and Disposal Sites
- Subchapter 4. **Criteria for Landfills and Disposal Sites**
- Article 3. CIWMB - Handling, Equipment and Maintenance

# DOES NOT APPLY TO TRANSFER FACILITIES

## Article 3. CIWMB - Handling, Equipment and Maintenance

- (4) Notification of the EA, the Director of the California Department of Toxic Substances Control (**DTSC**) or its delegated agent, and the Regional Water Quality Control Board (**RWQCB**), if a regulated hazardous waste or PCB waste is discovered at the facility.

# DOES APPLY TO TRANSFER FACILITIES

## ➤ Health and Safety Code §25507

(a) Except as provided in subdivision (b), the handler or any employee, authorized representative, agent, or designee of a handler shall, upon discovery, immediately report any release or threatened release of a hazardous material to the administering agency, and to the office, in accordance with the regulations adopted pursuant to Section 25503.



# FACILITY INSPECTIONS



- DON'T BELIEVE!
  - THE DRIVERS INSPECT THE LOADS BEFORE THEY PICK THEM UP.

# HIDDEN ON THE BOTTOM





# FACILITY INSPECTIONS



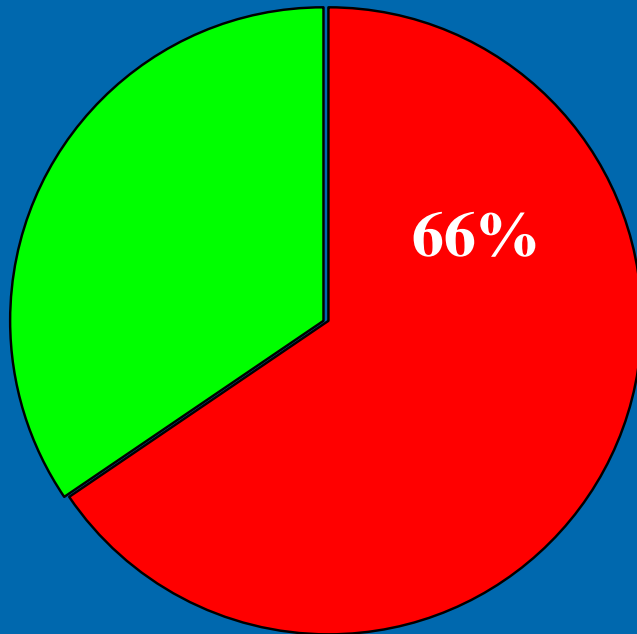
- DON'T BELIEVE!
- WE'VE NEVER HAD ANY HAZARDOUS WASTE DUMPED HERE.





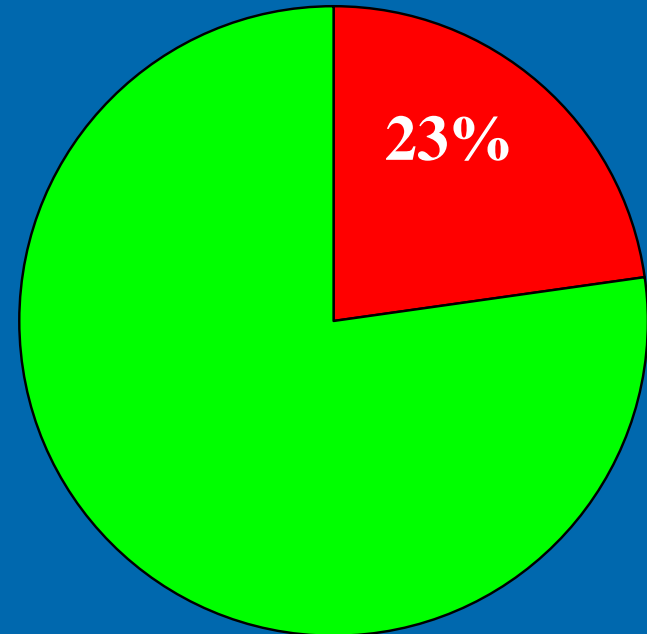
# Waste Load Inspections

1993



■ Hazardous Waste Found  
■ None Found

2005



■ Hazardous Waste Found  
■ None Found

# What Laws Apply

- California's Business and Professions Code section 17200, unfair business practices
  - any "unlawful, unfair or fraudulent business act or practice is a violation of Business and Professions Code section 17200.



*Riverside County*

***Waste Management Department***

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**No Hazardous Waste  
The End**